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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMON SCRUGGS,
ALLAN DANTO, and
HEIDI MACPHERSON,

a/k/a
Heidi Lyn Pfeifer,

Defendants.

CR No. : 08-00144-JW

UNSEALING APPLICATION AND
PROPOSED ORDER

The United States, by and through Joseph P. Russoniello, United States Attorney, and Jeffrey D. Nedrow, Assistant United States Attorney, hereby moves the Court for an order unsealing the above-referenced indictment. The United States had previously requested sealing of this indictment because at the time of the return of the original indictment, disclosure to the public of the existence of the indictment, and the allegations contained therein, would have substantially impaired the ongoing criminal investigation. The government has determined that disclosure of the indictment at this point will no longer likely jeopardize the investigation.

GOVERNMENT'S UNSEALING APPLICATION
AND PROPOSED ORDER

FILED
APR - 9 2008
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

1 Accordingly, there is no longer any just cause to maintain the indictment under seal. The
2 government therefore requests that the Court enter an order unsealing the indictment.

3 DATED: April 8, 2008

Respectfully submitted,

4 JOSEPH P. RUSSONIELLO
United States Attorney

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7 JEFFREY D. NEDROW
Assistant United States Attorney
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